

STATE OF INDIANA) FILED IN
CLERK'S OFFICE) IN THE LAKE CIRCUIT/SUPERIOR COURT
) ss.
COUNTY OF LAKE) SITTING AT _____, INDIANA
2015 OCT 23 PM 1 46

SHEILA LOCKHART)
MICHAEL A. DEWY)
CLERK LAKE CIRCUIT COURT)
Plaintiff,)

vs.)

TIMOTHY RASPOPTIS; PRECISION)
PIPELINE, LLC; and MASTEC, INC.)

Defendant.)

CAUSE NO: 45 D0115 10CT00193

COMPLAINT

Comes now the Plaintiff, SHEILA LOCKHART, by counsel, Ray Gupta and Carolyn Thiess, and for her cause of action against the Defendants, TIMOTHY RASPOPTIS, PRECISION PIPELINE, LLC, and MASTEC, INC., alleges and states as follows:

1. Plaintiff, SHEILA LOCKHART, was and is, at all relevant times, a resident of the County of Lake, State of Indiana.
2. Upon information and belief, Defendant, TIMOTHY RASPOPTIS, was and is, at all relevant times, a resident of the County of Oakland, State of Michigan.
3. Upon information and belief, Defendant, TIMOTHY RASPOPTIS, at all relevant times, was an employee, agent or otherwise under the dispatch of Defendant, PRECISION PIPELINE, LLC.
4. Defendant, PRECISION PIPELINE, LLC, is a corporation duly organized and existing under the laws of the State of Wisconsin.
5. Upon information and belief, Defendant, PRECISION PIPELINE, LLC, was the registered owner of the vehicle that was involved in the collision with Plaintiff, SHEILA LOCKHART on or about October 24, 2013.

6. Defendant, MASTEC, INC., is a corporation duly organized and existing under the laws of the State of Florida.

7. Upon information and belief, Defendant, PRECISION PIPELINE, LLC, is a subsidiary of Defendant, MASTEC, INC.

COUNT I (TIMOTHY RASPOPTSIS)

Plaintiffs re-allege and incorporate herein by reference paragraphs 1 through 7 above as if fully restated verbatim.

8. On October 24, 2013 at approximately 5:00 p.m., Defendant TIMOTHY RASPOPTSIS was traveling eastbound on 37th Avenue near the County Line Road intersection in Hobart, Lake County, Indiana when he negligently and carelessly rear-ended the vehicle being driven by Plaintiff SHEILA LOCKHART.

9. Defendant TIMOTHY RASPOPTSIS owed various duties to Plaintiff, SHEILA LOCKHART, including the duty to operate his vehicle in a safe and reasonable manner.

10. Defendant TIMOTHY RASPOPTSIS breached said duties owed to the Plaintiff SHEILA LOCKHART by:

- a. Failing to yield;
- b. Driver inattention;
- c. Failing to use the requisite degree of care that a reasonable and prudent person would have used under the same or similar circumstances;
- d. Failing to keep a safe and proper lookout for the safety of other drivers on the roadway;
- e. Speeding;

- f. Failing to exercise proper control of his vehicle;
- g. Failing to turn to either the right or the left to avoid an accident; and
- h. Failing to warn by sounding horn.

11. As a direct and proximate result of Defendant TIMOTHY RASPOPTSIS' negligent conduct, Plaintiff SHEILA LOCKHART suffered injuries and damages including but not limited to:

- a. Severe bodily injuries;
- b. Past, present, and future pain and suffering and loss of time;
- c. Past, present, and future emotional distress and mental anguish;
- d. Past, present, and future medical treatment and bills/expenses;
- e. Property damage and loss of use of his vehicle;
- f. Past lost wages and future earning potential;
- g. Permanent physical impairment and disability
- h. Loss of use of time.

WHEREFORE, the Plaintiff, SHEILA LOCKHART, demands judgment against the Defendant, TIMOTHY RASPOPTSIS, in such sum as will reasonably compensate her for the injuries and damages that she sustained, her costs expended herein, and for such further relief in the premises as this Court may deem just and proper.

COUNT II
(PRECISION PIPELINE, LLC)

12. Plaintiff re-alleges and incorporates herein by reference paragraphs 1 through 11 above as if fully restated verbatim.

13. At all times relevant hereto, Defendant, TIMOTHY RASPOPTSIS, was the employee, agent, or servant, of Defendant, PRECISION PIPELINE, LLC, or was otherwise acting under its authority.

14. Accordingly, Defendant, PRECISION PIPELINE, LLC, is vicariously liable for the acts of Defendant, TIMOTHY RASPOPTSIS, for the causes of the above action.

WHEREFORE, the Plaintiff, SHEILA LOCKHART, demands judgment against the Defendant, PRECISION PIPELINE, LLC, in such sum as will reasonably compensate her for the injuries and damages that she sustained, her costs expended herein, and for such further relief in the premises as this Court may deem just and proper.

COUNT III
(MASTEC, INC.)

15. Plaintiff re-alleges and incorporates herein by reference paragraphs 1 through 14 above as if fully restated verbatim.

16. At all times relevant hereto, Defendant, PRECISION PIPELINE, LLC, was the subsidiary of Defendant, MASTEC, INC., or was otherwise acting under its authority.

17. Accordingly, Defendant, MASTEC, INC., is vicariously liable for the acts of Defendant, TIMOTHY RASPOPTSIS, for the causes of the above action.

WHEREFORE, the Plaintiff, SHEILA LOCKHART, demands judgment against the Defendant, MASTEC, INC., in such sum as will reasonably compensate her for the injuries and damages that she sustained, her costs expended herein, and for such further relief in the premises as this Court may deem just and proper.

JURY DEMAND

Plaintiff, by counsel, demands trial by jury of all issues raised by the pleadings herein.

Respectfully submitted,

By: 

Ray Gupta, Atty. No. 18672-45
Carolyn Thiess, Atty. No. 31534-64
Attorneys for Plaintiff
Ray Gupta & Associates
833 West Lincoln Highway, Suite 380E
Schererville, IN 46375
Tel: (219) 923-5839
Fax: (219) 227-8209